

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR POLLUTION CONTROL

**Director's Review and Preliminary Determination of Permit Issuance
for
Nevada Resource Recovery Group, LLC
Rawhide Regional Landfill
November 21, 2005**

Nevada Resource Recovery Group, LLC (NRRG) has submitted an application for a new Class I Operating Permit to Construct (OPTC) to the Nevada Division of Environmental Protection, Bureau of Air Pollution Control (NDEP-BAPC) for their Rawhide Regional Landfill. The application materials related to new Class I OPTC permit were originally received by NDEP-BAPC on May 31, 2005. The permit application was deemed administratively complete by default on July 15, 2005. If approved, the issuance of a new Class I OPTC permit (no. **AP4953-1572**) will allow NRRG to construct a municipal solid waste landfill for future operation of their processes.

The facility is located in the northeast part of Mineral County, approximately 55 miles southeast of Fallon, Nevada. The town closest to the facility is Gabbs, which is located approximately 20 miles southeast of the landfill.

The primary function of the NRRG's proposed Landfill will be for the disposal of municipal solid waste (MSW) that includes household and commercial wastes, yard wastes, salvageable and recyclable wastes, and petroleum-contaminated soils. The facility will be closed to the general public. The majority of wastes (refuse) to be received by the facility will originate from collection of residential refuse in portions of northern Nevada and California. The total surface area at NRRG's landfill is approximately 660 acres and proposed landfill waste footprint of approximately 518 acres. The design capacity of the landfill will be 188,210,405 megagrams or approximately 188.21 million megagrams. This landfill will be a No Codisposal facility and will not accept any hazardous wastes.

Based on design capacity (equal to or greater than 2.5 million megagrams...) of the landfill, this facility is subject to the provisions of 40 CFR Part 60 Subpart WWW and requires a Class I (Title V) Air Quality Operating Permit to Construct.	<i>Facility-Wide Proposed Annual Emissions</i>		
	Pollutant(s)		
	NMOC	Nonmethane Organic Compounds	9.75 Mg/yr
	PM₁₀	Particulate matter <10 microns in diameter	1.87 ton/yr
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	NO_x	Oxides of Nitrogen	1.83 ton/yr
	CO	Carbon monoxide	0.34 ton/yr
	SO₂	Sulfur Dioxide	3.43 tons/yr
	VOCs	Volatile Organic Compounds	6.82 tons/yr
	HAPs	Hazardous Air Pollutants	4.13 tons/yr

The facility's calculated total NMOC (Nonmethane Organic Compounds) emission rate from the landfill is 9.75 Mg/yr, which is below the 50 Mg/yr thresholds. The facility is not required to have a landfill gas collection and control system at this time. There are no regulated pollutant emissions from facility's primary function (i.e. landfill operation) except VOC emissions of 0.57 ton/yr. VOC emissions are considered negligible at this time because NMOC emission rates are less than 50 Mg/yr thresholds. The regulated pollutant emissions from petroleum contaminated soil storage & disposal; and other insignificant activities are very minimal (refer to above Table). Therefore, no modeling analysis has been conducted at this time.

Based on the information provided in the facility's application materials, NRRG will not exceed the National Ambient Air Quality Standards. Adverse air quality impacts are not expected. Therefore, NDEP-BAPC has made a preliminary determination to issue the Class I Operating Permit to Construct (# AP4953-1572) with appropriate conditions.

The proposed source must comply with all State and Federal air quality requirements and all conditions established within the proposed Operating Permit.